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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Daniel Gordon, et al.,

Plaintiffs,

No. 1:15-cv-05457 (KPF)

v.

Amadeus IT Group, S.A., et al.,

Defendants.

STIPULATED ORDER OF DISMISSAL
AS TO CERTAIN NAMED PLAINTIFFS PURSUANT TO FED. R. CIV. P. 41(a)

WHEREAS, on July 14, 2015 the above-captioned action (the "Action") was filed against Defendants Amadeus IT Group, S.A., Amadeus North America, Inc., Amadeus Americas, Inc., Sabre Corporation f/k/a Sabre Holdings Corporation, Sabre Holdings Corporation, Sabre GBL Inc., Sabre Travel International Limited, Travelport Worldwide Limited, and Travelport LP d/b/a Travelport (collectively, "Defendants");

WHEREAS, on October 2, 2015 an Amended Complaint seeking damages under various state antitrust and consumer protection laws and injunctive relief under the Sherman Act was filed against Defendants by Plaintiffs Steven Abraham, Nina Bartoshevich, Paul Bartoshevich, Michael Binz, Robert Binz V, Winter Birdsong, Gary Boren, Tiffany Brown, Karen Carlet, Diana Carmel, Leslie Clemenson, Tom Clynes, Robert Cohen, Kim Coughlin, Kathleen Davis, Brian DeBruyn, Robert DeVault, Rae Dillon, Scott Divona, Michele Dunham, Stephanie Eide, Linda Ewert, George Fakoury, Janis Fakoury, Samuel Garvin, Daniel Gordon, Michelle Green, Tim Gregory, Sandra Gustafson, Patrick Haag, Eric Halvorson, Teresa Heffernan, Michael Hicks, Brian R. Huffinan, Doug Johnson, Moira Kerrigan, George Knudsen, Bruce Kolman, Terri Kruback, Peter Lepari, Andrew Margolick, Thomas Martin, Justin McClinton, Brian

McCrudden, Gregory Melita, Kelly Melita, Jaqueline Molina, Stephen P. Moore, Lisa Moreno, Sophie Mosgrove, Paul Nelson, Anthony Norton, Aja Patterson, Aleksandr Pischanskiy, Regina Point, Joel Ranck, Jeanne N. Rice, Allan Rotman, Eileen Rotman, Michael Sabran, Diana Shead, Robert Shumaker, Nili Sinai-Nathan, Joe Solo, Keegan Stock, Daniel Stone, Kevin Sullivan, Ellen Ullman, Loraine Van Horn, Wendi Lee Voss, Douglas Weil, Lincoln Wheeler, Matthew White, and Barbara Zimmerman (collectively, "Plaintiffs") (Dkt. No. 106);

WHEREAS, on July 6, 2016, the Court issued an opinion and order dismissing Plaintiffs' state law claims for damages on the basis that they were preempted by the Airline Deregulation Act ("ADA") and permitting Plaintiffs' claims for injunctive relief under the Sherman Act to proceed against Defendants (Dkt. No. 170) (the "Dismissal Order");

WHEREAS, in connection with Plaintiffs' Sherman Act claim seeking injunctive relief there exists no need to have a named class representative from each state under which claims were asserted in the Amended Complaint;

WHEREAS, the Plaintiffs wish to proceed in connection with their Sherman Act claim seeking only injunctive relief in the most efficient manner and to avoid the cost and burden of unnecessary discovery;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel, pursuant to Fed. R. Civ. P. 41(a), and SO ORDERED by the Court, that:

1. The Sherman Act claims of all Plaintiffs except for those who Plaintiffs' Interim Co-Lead Counsel specifically identify (the "Remaining Plaintiffs") shall be dismissed, and only the Remaining Plaintiffs will pursue claims for injunctive relief under the Sherman Act. Plaintiffs' Interim Co-Lead Counsel shall file the appropriate motion with the Court to effectuate

the dismissal of the Sherman Act claims of all Plaintiffs other than Remaining Plaintiffs (the “Dismissed Plaintiffs”) within twenty-one (21) days of the date of entry of this Order.

2. The Remaining Plaintiffs shall solely and exclusively prosecute the Sherman Act claim on behalf of the putative injunctive relief class, and shall be the sole and exclusive representatives of such putative class. For avoidance of doubt, no Dismissed Plaintiff shall act at any time hereafter as a representative of any putative Sherman Act injunctive relief class, including in the event that the Remaining Plaintiffs are found to be inadequate representatives of any such putative class.

3. Remaining Plaintiffs shall be subject to discovery consistent with the Federal Rules of Civil Procedure, the Local Rules of this Court, and this Court’s orders, including without limitation, the Requests for Production of Documents and Interrogatories served by Defendants on each Plaintiff, dated October 5, 2016 (the “Pending Discovery”). Each Remaining Plaintiff shall respond to the Pending Discovery within twenty-one (21) days of the date of entry of this Order. Plaintiffs’ Interim Co-Lead Counsel will make a good faith effort to produce documents responsive to Defendants’ Requests for Production of Documents and respond to Defendants’ First Set of Interrogatories on a rolling basis and in advance of the twenty-one (21) day deadline set herein.

4. Nothing herein shall prohibit a Dismissed Plaintiff from seeking to rejoin this Action as a named Plaintiff solely with respect to the state law claims for money damages dismissed by this Court by the Dismissal Order should such claims be reinstated following a decision by a Court of Appeals reversing or remanding for further consideration the Dismissal Order. Any such claims of the Dismissed Plaintiffs shall be tolled pending a decision by a Court of Appeals reversing or remanding for further consideration the Dismissal Order. Defendants

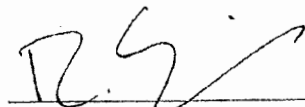
agree not to oppose a motion by the Dismissed Plaintiffs seeking to rejoin this Action as a named Plaintiff with respect to the state law claims following the reinstatement, if any, of such claims.

5. Should a Dismissed Plaintiff seek to rejoin this Action following any reversal of the Court's Dismissal Order, Defendants shall be permitted to take discovery of such Dismissed Plaintiff consistent with the Federal Rules of Civil Procedure, the Local Rules of this Court, and this Court's orders.

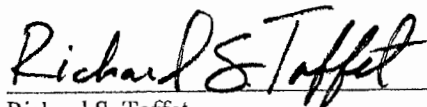
6. In the event any Dismissed Plaintiff rejoins this Action following a reversal or remand for further consideration of the Court's Dismissal Order, Defendants shall not be prohibited from opposing certification of any putative class seeking damages under state law, including on the basis of the adequacy of any Dismissed Plaintiff as a representative of any such class.

Dated: November 16, 2016

Respectfully submitted,



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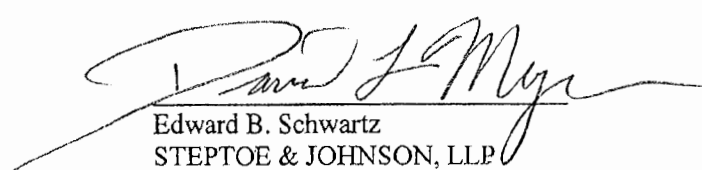
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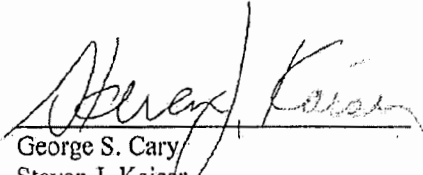
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

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Inc., and Sabre Travel International Limited*

SO ORDERED, this 18th day of November, 2016.



The Honorable Katherine Polk Failla
United States District Judge

Those Plaintiffs who are not included among the Remaining Plaintiffs
will be dismissed by separate order of the Court, pursuant to 
paragraph 1 of this stipulation.